



Hogan Lovells US LLP  
875 Third Avenue  
New York, NY 10022  
T +1 212 918 3000  
F +1 212 918 3100  
www.hoganlovells.com

Dennis H. Tracey, III  
Partner  
T + 1 212 918 3524  
dennis.tracey@hoganlovells.com

December 8, 2014

Judge Paul A. Crotty, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Chambers 1350  
New York, NY 10007

Re: *Donoghue v. Achillion Pharmaceuticals, Inc.*, No. 1:14-cv-8353-PAC (S.D.N.Y.)  
*Roth v. RA Capital Management, LLC*, No. 1:14-cv-8594-PAC (S.D.N.Y.)

Dear Judge Crotty,

I write on behalf of all defendants in the above-captioned matters, and in accordance with Local Civil Rule 7.1(d) and the Court's Individual Rule 1(E), to request an extension of time to answer or otherwise respond to the Donoghue and Roth complaints.

The dates on which defendants are currently due to answer or otherwise respond are December 22, 2014 for the Donoghue action (14-cv-8353) and December 29, 2014 for the Roth action (14-cv-8594). On November 3, 2014, counsel for plaintiff Deborah Donoghue requested a pre-motion conference regarding Ms. Donoghue's request to consolidate the Donoghue action with the related Roth action. The pre-motion conference was originally scheduled for December 9, 2014. On December 4, 2014, the Court adjourned that conference until January 21, 2015.

Counsel for all defendants have conferred and, in order to promote efficiency in the conduct of these related actions, seek to bring a joint motion for an extension of time to answer or otherwise respond to the Donoghue and Roth complaints until the later of February 10, 2015 or 20 days after the Court rules on the consolidation issue. This is defendants' first request for an extension of time.

Defendants have conferred with counsel for plaintiffs Donoghue and Roth, respectively, and confirmed that plaintiffs consent to defendants' joint motion.<sup>1</sup>

Respectfully submitted,

By:           /s/ Dennis Tracey, III            
Dennis H. Tracey, III  
Hogan Lovells US LLP  
875 Third Avenue  
New York, NY 10022  
Tel: (212) 918-3000  
Fax: (212) 918-3100  
dennis.tracey@hoganlovells.com

*Attorneys for Defendants, RA Capital  
Management, LLC, RA Capital  
Healthcare Fund, L.P. and Peter  
Kolchinsky*

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<sup>1</sup> Should the Court require a pre-motion conference regarding defendants' unopposed joint motion, counsel for all parties respectfully request that such conference be scheduled for January 21, 2015, which is also the date of the pre-motion conference regarding plaintiff Donoghue's consolidation request. The parties propose January 22, 2015 and January 23, 2015 as alternate conference dates.

Judge Paul A. Crotty, U.S.D.J.

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Robert H. Pees  
Akin Gump Strauss Hauer & Feld LLP  
One Bryant Park  
New York, NY 10036-6745  
[rpees@akingump.com](mailto:rpees@akingump.com)  
Tel: (212) 872-1072  
Fax: (212) 872-1002

*Attorneys for Defendant, Blackwell  
Partners, LLC*

John F. Batter, III  
Ari J. Savitzky  
Wilmer Cutler Pickering  
Hale and Dorr LLP  
60 State Street  
Boston, MA 02109  
Tel: (617) 526-6754  
Fax: (617) 526-5000

*Attorneys for Nominal Defendant  
Achillion Pharmaceuticals, Inc.*

cc: David Lopez, Esq.  
Glenn Ostrager, Esq.  
Paul Wexler, Esq.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of December 2014, I served the foregoing document upon all registered counsel in the case via the Court's CM/ECF system by filing the document electronically with the Clerk of Court.

New York, New York

/s/ Dennis H. Tracey, III  
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